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8 **UNITED STATES DISTRICT COURT**  
9 **WESTERN DISTRICT OF WASHINGTON**  
10 **TACOMA DIVISION**  
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Hon. Ronald B. Leighton

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14 IN THE MATTER OF: ) CAUSE # 3:17-CV-05321-RBL  
Alejandro-Ray Pedrotti Calderon )  
PLANTIFF ) **RESPONSE TO**  
Vs. ) **MOTION TO DISMISS**  
DYNAMIC COLLECTORS, INC. ) **JURY DEMAND**  
DEFENDANT. ) PRESENTED BY:  
ALEJANDRO-RAY  
PEDROTTI CALDERON

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19 **PLAINTIFF'S RESPONSE TO DEFENDANT DYNAMIC COLLECTORS,**  
20 **INC.'S MOTION TO DISMISS**  
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23 Plaintiff, Alejandro-Ray Pedrotti Calderon, hereby responds to Defendant  
24 DYNAMIC COLLECTORS, INC.'S Motion to Dismiss Plaintiff's Complaint and states:  
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1           **A.** Plaintiff objects to the defense counsel's statement that these documents are  
2 not questioned by any party. The plaintiff does questions the authenticity of exhibit "D".  
3 The plaintiff cannot authenticate any information on it. The plaintiff can only attest to the  
4 fact that the alleged docket was sent by the defendant. And that this alleged docket does  
5 not list the plaintiff of that case. Exhibit "D" is not a court certified document. And  
6 exhibit "D" has been materially defaced.

7           **B.** The plaintiff objects to the defendant's presumption that the alleged debt is  
8 based on traffic infraction fines. Defendant assumes facts not in evidence. The  
9 defendant's own dunning letter admits "This is a communication from a debt collector.  
10 This is an attempt to collect a debt." (Exhibit A) The defendant by its own admittance  
11 attempts to collect a debt, not a mere obligation.

12           **C.** The plaintiff objects to the defendant's presumption that the alleged debt is  
13 based on traffic infraction fines. Defendant assumes facts not in evidence.

14           **D.** It is not necessary in this Response to outline exactly how defendant's actions  
15 violated the law.

16           The plaintiff believes his complaint is not subject to dismissal. However, if the  
17 court determines the complaint is deficient. Plaintiff requests that he be allowed to amend  
18 it. FDCPA, WCAA and WCPA empower the people to act as private attorney generals  
19 and give the people a private right of action to seek redress.

20           The plaintiff respectfully request that the court take notice of the well-pleaded  
21 allegations of the pro se complaint, which this court must accept as true at this juncture of  
22 the proceedings, and which, in light of the plaintiff's pro se status, the court must hold to  
23 a less stringent standard than formal pleadings drafted by an attorney and construed

1 liberally, see Haynes v. Kerner, 404 U.S. 519, 520, 92 S. Ct. 594, 596, 30 L.Ed.2d 652  
2 (1972)

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4 WHEREFORE, Plaintiff request that the court deny Defendant's Motion to  
5 Dismiss, or in the alternative, allow Plaintiff to amend his complaint.

6 Dated: May 31, 2017

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8 Respectfully submitted,

9  
10 /s Alejandro Calderon

11 Alejandro-Ray Pedrotti Calderon

12 1332 East 51<sup>st</sup> Street

13 Tacoma, WA 98404